

# **PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT**

**Avery Dennison  
870 West Anderson Blvd.  
Greenfield, Indiana 46140**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T059-7475-00018	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

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## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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The Permittee owns and operates a stationary pressure sensitive paper coating and laminating operation.

Responsible Official: Rob Matt  
Source Address: 870 West Anderson Blvd., Greenfield, Indiana 46140  
Mailing Address: 870 West Anderson Blvd., Greenfield, Indiana 46140  
Phone Number: 317-462-1988  
SIC Code: 2672  
County Location: Hancock  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
Minor Source, under PSD Rules;  
Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source consists of the following emission units and pollution control devices:

- (1) One (1) pressure sensitive paper coating operation, constructed in October, 1994, identified as BE-1, with maximum capacity of nine hundred ninety-three (993) billion square inches per year, exhausting to two (2) stacks (C-1 and D-1), consisting of the following equipment:
  - (A) One (1) flow coating operation; and
  - (B) Two (2) natural gas fired drying ovens, with total maximum heat input capacity of 48.7 million British thermal units per hour (mmBtu/hr).
- (2) Two (2) natural gas fired boilers, constructed in October, 1994, identified as B-01 and B-02, with maximum heat input capacity of 10.205 million British thermal units per hour (mmBtu/hr) each, exhausting to two (2) stacks (B-01 and B-02).

### A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1 (21):

- (1) Five (5) water-based emulsion adhesive storage tanks with maximum storage capacity of 16,400 gallons each; and
- (2) One (1) emulsion wastewater storage tank with maximum storage capacity of 7,000 gallons.

**A.4 Part 70 Permit Applicability [326 IAC 2-7-2]**

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22).
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

**SECTION B**

**GENERAL CONDITIONS**

**B.1 Permit No Defense [IC 13]**

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- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

**B.2 Definitions [326 IAC 2-7-1]**

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Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

**B.3 Permit Term [326 IAC 2-7-5(2)]**

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This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

**B.4 Enforceability [326 IAC 2-7-7(a)]**

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- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

**B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]**

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The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

**B.6 Severability [326 IAC 2-7-5(5)]**

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The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

**B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]**

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This permit does not convey any property rights of any sort, or any exclusive privilege.

**B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]**

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- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

**B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]**

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- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

**B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]**

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

**B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was based on continuous or intermittent data;
  - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
  - (5) Any insignificant activity that has been added without a permit revision;
  - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
    - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
    - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
    - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM.

**B.13 Emergency Provisions [326 IAC 2-7-16]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management,  
Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.



The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

**B.14 Permit Shield [326 IAC 2-7-15]**

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- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
  - (1) The applicable requirements are included and specifically identified in this permit; or
  - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM has issued the modification. [326 IAC 2-7-12(b)(7)]

**B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]**

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Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

**B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

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- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) An emergency as defined in 326 IAC 2-7-1(12); or
  - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
  - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

**B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM determines any of the following:
- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

- (c) Proceedings by IDEM, OAM to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.18 Permit Renewal [326 IAC 2-7-4]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.
  - (2) If IDEM, OAM upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM any additional information identified as being needed to process the application.

- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]  
If IDEM, OAM fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

**B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]**

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- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

**B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]**

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The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

**B.22 Operational Flexibility [326 IAC 2-7-20]**

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]

The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

**B.23 Construction Permit Requirement [326 IAC 2]**

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Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

**B.24 Inspection and Entry [326 IAC 2-7-6(2)]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.  
[326 IAC 2-7-6(6)]
  - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM nor an authorized representative, may disclose the information unless and until IDEM, OAM makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
  - (2) The Permittee, and IDEM, OAM acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

**B.25 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]**

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- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

**B.27 Advanced Source Modification Approval [326 IAC 2-7-5(16)]**

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The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3 and such modifications occur only during the term of this permit.



## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source
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### Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]  
Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- C.2 Opacity [326 IAC 5-1]  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six minute averaging period, as determined in 326 IAC 5-1-4.
  - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]  
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]  
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.
- C.5 Fugitive Dust Emissions [326 IAC 6-4]  
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]  
All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.
- C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]  
(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control  
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

#### **Testing Requirements [326 IAC 2-7-6(1)]**

##### **C.8 Performance Testing [326 IAC 3-6]**

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### **Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

##### **C.9 Compliance Schedule [326 IAC 2-7-6(3)]**

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The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

##### **C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend the compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

##### **C.11 Monitoring Methods [326 IAC 3]**

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Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

**C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on December 10, 1996 with the Part 70 Permit application.
- (b) If the ERP is disapproved by IDEM, OAM the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (e) Upon direct notification by IDEM, OAM that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.  
[326 IAC 1-5-3]

**C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]**

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
  - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
  - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
  - (3) A verification to IDEM, OAM that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results.

The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

##### **C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]**

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
- (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:
- Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.

##### **C.16 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]**

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM representative, for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or local agency within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;

- (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

**C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)]**

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- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

## Stratospheric Ozone Protection

### C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1

## FACILITY CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

(Advanced Source Modification)

- (1) One (1) pressure sensitive paper coating operation, constructed in October, 1994, identified as BE-1, with maximum capacity of nine hundred ninety-three (993) billion square inches per year, exhausting to two (2) stacks (C-1 and D-1), consisting of the following equipment:
  - (A) One (1) flow coating operation; and
  - (B) Two (2) natural gas fired drying ovens, with total maximum heat input capacity of 48.7 million British thermal units per hour (mmBtu/hr).

### Insignificant Activities

- (IA1) Five (5) water-based emulsion adhesive storage tanks with maximum storage capacity of 16,400 gallons each; and
- (IA2) One (1) emulsion wastewater storage tank with maximum storage capacity of 7,000 gallons.

## Emission Limitations and Standards [326 IAC 2-7-5(1)]

### D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]

Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), no owner or operator of a facility engaged in the surface coating of pressure sensitive paper may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 2.9 pounds VOC per gallon of coating excluding water, delivered to the coating applicator.

### D.1.2 Volatile Organic Compounds (VOC) [326 IAC 12] [40 CFR 60.440, Subpart RR]

Pursuant to 40 CFR 60.442, Subpart RR, when the pressure sensitive paper coating operation input Volatile Organic Compound (VOC) usage exceeds 45 megagrams per 12 consecutive month period (equivalent to 49.6 tons per 12 consecutive month period), the pressure sensitive paper coating operation shall not discharge into the atmosphere in excess of 0.20 kg VOC per kg of coating solids (0.20 lb VOC per lb of coating solids) applied as calculated on a weighted average basis for each calendar month.



## Compliance Determination Requirements

### D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Whenever, the input VOC usage exceeds forty-five (45) megagrams per 12 consecutive month period, the Permittee shall perform VOC testing using the method established in the test protocol. IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required, compliance with the Volatile Organic Compound (VOC) limits specified in Conditions D.1.1 and D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

### D.1.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

## Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

### D.1.5 Monitoring

Monitoring of these facilities is not required by this permit. However, any change or modification to these facilities as specified in 326 IAC 2-1 may require these facilities to have monitoring requirements.

## Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

### D.1.6 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through(5) below. Records maintained for (1), (2), (4), and (5) shall be taken monthly. Records maintained for (3) shall be taken daily as needed. All records maintained shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1 and D.1.2.

- (1) The amount and VOC content of each coating material and solvent used. Records may include purchase orders, invoices, production data or material safety data sheets (MSDS) as necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- (2) A log of usage each month and logs of the dates of use when using non-compliant coatings;
- (3) The volume weighted VOC content of the coatings used for each day that any coating with VOC content greater than 2.9 pounds per gallon is used. If at any time a coating with VOC content greater than 2.9 pounds per gallon less water is used, compliance with this rule shall be shown by use of the following equation to calculate daily volume weighted average:

$$\frac{\text{lb VOC}}{\text{gallon less water}} = \frac{3 \text{ coatings } [Dc * O * Q / [1 - W * Dc / Dw]]}{3C}$$

Dc = density of coating, lb/gal

Dw = density of water, lb/gal

O = weight percent organics, % Q = quantity of coating, gal/unit

W = percent volume water, %

C = total of coatings used, gal/unit;

- (4) The total VOC usage for each month; and
- (5) The weight of VOCs emitted for each compliance period.
- (b) The Permittee shall keep records readily accessible of the dimension of the five (5) waterbased emulsion adhesive storage vessels and an analysis showing the capacity of each storage vessel for the life of the source.
- (c) Pursuant to 40 CFR 60.445, the Permittee shall maintain the following records:
  - (1) A calendar month record of all coatings used and the results of the manufacturer's formulation data.
  - (2) A calendar month record of the amount of solvent applied in the coating facility.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.7 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

## SECTION D.2 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (2) Two (2) natural gas fired boilers, constructed in October, 1994, identified as B-01 and B-02, with maximum heat input capacity of 10.205 million British thermal units per hour (mmBtu/hr) each, exhausting to two (2) stacks (B-01 and B-02).

## Emission Limitations and Standards [326 IAC 2-7-5(1)]

### D.2.1 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(d)), the two (2) 10.205 million British thermal units per hour natural gas fired boilers identified as B-01 and B-02, constructed in 1994 shall be limited to 0.49 pounds per million British thermal unit. This limitation was based on the following equation:

$$Pt = 1.09 / Q^{0.26}$$

where:

Pt = Pounds of particulate matter emitted per million Btu (lb/mmBtu) heat input.

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

## **Compliance Determination Requirements**

### **D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]**

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The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required, compliance with the particulate matter (PM) limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

## **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

### **D.2.3 Monitoring**

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Monitoring of these facilities is not required by this permit. However, any change or modification to these facilities as specified in 326 IAC 2-1 may require these facilities to have monitoring requirements.

## **Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

### **D.2.4 Record Keeping Requirements**

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Pursuant to 40 CFR 60.40c, the Permittee shall record and maintain records of the amounts of fuel combusted during each day for a period of two years following the date of such record for the two (2) 10.205 million British thermal units per hour (mmBtu/hr) natural gas fired boilers, identified as B-01 and B-02.

### **D.2.5 Natural Gas Fired Boiler Certification**

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An annual certification shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the Natural Gas Fired Boiler Certification form located at the end of this permit, or its equivalent, no later than July 1 of each year for the two (2) 10.205 million British thermal unit per hour (mmBtu/hr) natural gas fired boilers.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Avery Dennison  
Source Address: 870 West Anderson Blvd., Greenfield, Indiana 46140  
Mailing Address: 870 West Anderson Blvd., Greenfield, Indiana 46140  
Part 70 Permit No.: T059-7475-00018

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION  
P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT  
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Avery Dennison  
Source Address: 870 West Anderson Blvd., Greenfield, Indiana 46140  
Mailing Address: 870 West Anderson Blvd., Greenfield, Indiana 46140  
Part 70 Permit No.: T059-7475-00018

**This form consists of 2 pages**

**Page 1 of 2**

Check either No. 1 or No.2	
<b>9</b>	1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
<b>9</b>	2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) C The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

**Page 2 of 2**

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: Avery Dennison  
Source Address: 870 West Anderson Blvd., Greenfield, Indiana 46140  
Mailing Address: 870 West Anderson Blvd., Greenfield, Indiana 46140  
Part 70 Permit No.: T059-7475-00018

**This certification shall be included when submitting monitoring, testing reports/results  
or other documents as required by this permit.**

Report period

Beginning: \_\_\_\_\_

Ending: \_\_\_\_\_

Boiler Affected

Alternate Fuel

Days burning alternate fuel

From

To


I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: Avery Dennison  
Source Address: 870 West Anderson Blvd, Greenfield, Indiana 46140  
Mailing Address: 870 West Anderson Blvd, Greenfield, Indiana 46140  
Part 70 Permit No.: T059-7475-00018  
Facility: One (1) pressure sensitive tape coating operation  
Parameter: Volatile Organic Compound (VOC)  
Limit: 45 Megagrams per year (equivalent to 49.6 tons per year). When exceeded, input VOC shall be equal to or less than 0.20 kg VOC per kg coating solids.

YEAR: \_\_\_\_\_

Month	VOC usage this month (tons)	VOC usage last 11 months (tons)	VOC usage last 12 months (tons)	Kg VOC per kg coating solids (when applicable)

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Avery Dennison  
Source Address: 870 West Anderson Blvd., Greenfield, Indiana 46140  
Mailing Address: 870 West Anderson Blvd., Greenfield, Indiana 46140  
Part 70 Permit No.: T059-7475-00018

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

**9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD**

**9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.**

<b>Compliance Monitoring Requirement</b> (e.g. Permit Condition D.1.3)	<b>Number of Deviations</b>	<b>Date of each Deviation</b>

Form Completed By: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

## Indiana Department of Environmental Management Office of Air Management

### Technical Support Document (TSD) for a Part 70 Operating Permit and Enhanced New Source Review (ENSR)

#### Source Background and Description

**Source Name:** Avery Dennison  
**Source Location:** 870 West Anderson Blvd, Greenfield, Indiana 46140  
**County:** Hancock  
**SIC Code:** 2672  
**Operation Permit No.:** T059-7475-00018  
**Permit Reviewer:** Cathie Moore

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Avery Dennison relating to the operation of a pressure sensitive tape coating operation.

#### Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (1) One (1) pressure sensitive tape coating operation, constructed in October, 1994, identified as BE-1, maximum capacity is confidential as requested by the source, exhausting to two (2) stacks (C-1 and D-1), consisting of the following equipment:
  - (A) One (1) flow coating operation;
  - (B) Two (2) natural gas fired drying ovens, with total maximum heat input capacity of 48.7 million British thermal units per hour (mmBtu/hr); and
  - (C) Six (6) waterbased emulsion adhesive and emulsion wastewater storage tanks, with maximum storage capacities of 16,400 gallons each.
- (2) Two (2) natural gas fired boilers, constructed in October, 1994, identified as B-01 and B-02, with maximum heat input capacity of 10.205 million British thermal units per hour (mmBtu/hr) each, exhausting to two (2) stacks (B-01 and B-02).

#### Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR

There are no unpermitted facilities operating at this source during this review process.

#### New Emission Units and Pollution Control Equipment Requiring ENSR

The source has requested to increase the maximum capacity of the one (1) pressure sensitive tape coating operation (BE-1). The potential volatile organic compound (VOC) emissions will increase fifty-one (51) tons per year.

#### Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) Six (6) natural gas fired unit heaters, with maximum heat input capacity of 0.13 million British thermal units per hour (mmBtu/hr) each;
- (2) Five (5) natural gas fired roof top heating/cooling units, with maximum heat input capacity of 0.163, 0.317, 0.317, 0.278, and 0.400 million British thermal units per hour (mmBtu/hr);

- (3) Twelve (12) natural gas fired door heaters, with maximum heat input capacity of 0.87 million British thermal units per hour (mmBtu/hr) each;
- (4) Seven (7) natural gas fired rotation heating units, with maximum heat input capacity of 0.40 million British thermal units per hour (mmBtu/hr) each;
- (5) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour;
- (6) Combustion source flame safety purging on startup;
- (7) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (8) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings;
- (9) Machining where an aqueous coolant continuously floods the machining interface;
- (10) Cleaners and solvents characterized as follows:
  - A) having a vapor pressure equal to or less than 2 kPa, 15 mmHg, or 0.3 psi measured at 38 degrees C (100 degrees F) or
  - B) having a vapor pressure equal to or less than 0.7 kPa, 5 mmHg, or 0.1 psi measured at 20 degrees C (68 degrees F)the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;
- (11) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment;
- (12) Closed loop heating and cooling systems;
- (13) Infrared cure equipment;
- (14) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs;
- (15) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs;
- (16) Forced and induced draft cooling tower system not regulated under a NESHAP;
- (17) Heat exchanger cleaning and repair;
- (18) Process vessel degassing and cleaning to prepare for internal repairs;
- (19) Paved and unpaved roads and parking lots with public access;
- (20) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process;
- (21) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment;

- (22) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower;
- (23) Stationary fire pumps;
- (24) A laboratory as defined in 326 IAC 2-7-1(20)(C); and
- (25) Silicone Batching.

### Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (1) Construction Permit CP059-3176-00018, issued on April 15, 1994.

All conditions from previous approvals were incorporated into this Part 70 permit.

### Enforcement Issue

There are no enforcement actions pending.

### Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on December 10, 1996. Additional information was received on February 12, 1998.

A notice of completeness letter was mailed to the source on January 13, 1997.

### Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

Pollutant	Potential Emissions (tons/year)
PM	less than 100
PM-10	less than 100
SO <sub>2</sub>	less than 100
VOC	greater than 100, less than 250
CO	less than 100
NO <sub>x</sub>	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
Vinyl Acetate	greater than 10
TOTAL	greater than 25

- (a) The potential emissions (as defined in 326 IAC 1-2-55) of volatile organic compound (VOC) are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential emissions (as defined in 326 IAC 1-2-55) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in 326 IAC 1-2-55) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

### Actual Emissions

The following table shows the actual emissions from the source. This information reflects the source's 1995 emission data.

Pollutant	Actual Emissions (tons/year)
PM	1.84
PM-10	1.84
SO <sub>2</sub>	0.14
VOC	54.73
CO	5.65
NO <sub>x</sub>	6.56
HAP (Vinyl Acetate)	47.65

### County Attainment Status

The source is located in Hancock County.

Pollutant	Status
TSP	attainment
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Hancock County has been designated as attainment or unclassifiable for ozone.

### Federal Rule Applicability

- (a) The pressure sensitive tape coating operation is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.440, Subpart RR). Pursuant to this subpart:
  - (1) The paper/pressure sensitive tape and label coating operation shall not discharge into the atmosphere in excess of 0.20 kg VOC per kg of coating solids applied as calculated on a weighted average basis for one calendar month.

- (2) A compliance performance test must be conducted between 30 and 36 months after the issuance of this permit. The performance test shall be conducted utilizing EPA Method 8260A, or methods acceptable to the Commissioner, to demonstrate VOC content in the water based coating.
- (b) The six (6) waterbased emulsion adhesive and emulsion wastewater storage tanks are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.116b, Subpart Kb) because their storage capacities are greater than forty (40) cubic meters, but less than seventy-five (75) cubic meters. Pursuant to 40 CFR 60.116b (a) and (b):
  - (1) The Permittee shall keep records readily accessible of the dimension of each storage vessel and an analysis showing the capacity of each storage vessel for the life of the source.
- (c) The two (2) 10.205 million British thermal units per hour (mmBtu/hr) are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc) because their heat input capacities are greater than ten (10) million British thermal units per hour (mmBtu/hr) but less than one hundred (100) million British thermal units per hour. There are no applicable requirements for natural gas boilers.
- (d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs), 40 CFR 63, applicable to this source.

#### **State Rule Applicability - Entire Source**

##### **326 IAC 1-6-3 (Preventive Maintenance Plan)**

Pursuant to 326 IAC 1-6-3 (Preventive Maintenance Plan), the source is required to submit a Preventive Maintenance Plan (PMP) for the pressure sensitive tape coating operation.

##### **326 IAC 1-5-2 (Emergency Reduction Plans)**

The source has submitted an Emergency Reduction Plan (ERP) on December 10, 1996 with the Part 70 Permit application. The ERP has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

##### **326 IAC 2-2 (Prevention of Significant Deterioration)**

This source is not subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) because the potential VOC emissions are less than two hundred fifty (250) tons per year and it is not one of the 28 listed categories in this rule.

##### **326 IAC 2-1-3.2 (Enhanced New Source Review)**

This draft Part 70 permit (T059-7475-00018) shall satisfy the requirements of 326 IAC 2-1-3.2 (Enhanced New Source Review) for the increase in capacity for the one (1) pressure-sensitive tape coating operation.

##### **326 IAC 2-6 (Emission Reporting)**

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of volatile organic compound (VOC). Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

##### **326 IAC 5-1 (Visible Emissions Limitations)**

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

### State Rule Applicability - Individual Facilities

#### 326 IAC 8-2-5 (Paper Coating Operations)

The one (1) flow coating operation is subject to the requirements of 326 IAC 8-2-5 (Paper Coating Operations) because it was constructed in 1984 which is after the January 1, 1980 applicability date and its potential VOC emissions are greater than twenty-five (25) tons per year.

Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the VOC content of the coatings applied to labels of any substrate, pressure sensitive tapes, paper, plastic or metal foil by means of web coating shall be limited to 2.9 pounds VOC per gallon of coating delivered to the applicator less water.

Based on the MSDS submitted by the source and calculations made, the one (1) pressure-sensitive tape coating operation is in compliance with this requirement. The calculations have not been attached to this document in Appendix A because Avery Dennison requested that the coating information be considered confidential.

#### 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

The six (6) waterbased emulsion adhesive and emulsion wastewater storage tanks are not subject to the requirements of 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels) because this source is not located in any of the listed counties in this rule.

#### 326 IAC 6-2-4 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(d))

Pursuant to 326 IAC 6-2-4 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(d)), the two (2) 10.205 million British thermal units per hour natural gas fired boilers identified as B-01 and B-02, constructed in 1994 shall be limited to 0.49 pounds per million British thermal unit. This limitation was based on the following equation:

$$Pt = 1.09 / Q^{0.26}$$

where:

Pt = Pounds of particulate matter emitted per million Btu (lb/mmBtu) heat input.

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

(a) For the boilers:

$$Q = 10.205 + 10.205 = 20.410 \text{ mmBtu/hr}$$

$$Pt = 0.49 \text{ lb/mmBtu}$$

The boilers are in compliance when using natural gas by the following equation:

$$13.7 \text{ lb/MMCF, to convert this to lb/mmBtu} = 13.7 \text{ lb/MMCF} * \text{MMCF} / 1,000 \text{ mmBtu} = 0.0137 \text{ lb/mmBtu}$$

$0.0137 \text{ lb/mmBtu} < 0.49 \text{ lb/mmBtu}$ , therefore the boilers are in compliance.

### Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

### Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.
- (b) 326 IAC 2-1-3.4 (New Source Toxics Rule) does not apply to this source because there are no new emission units.

### Conclusion

The operation of this pressure sensitive tape coating operation shall be subject to the conditions of the attached proposed **Part 70 Permit No. T059-7475-00018**.



# Indiana Department of Environmental Management Office of Air Management

## Addendum to the Technical Support Document for Part 70 Operating Permit

<b>Source Name:</b>	Avery Dennison
<b>Source Location:</b>	870 West Anderson Blvd, Greenfield, Indiana 46140
<b>County:</b>	Hancock
<b>SIC Code:</b>	2672
<b>Operation Permit No.:</b>	T059-7475-00018
<b>Permit Reviewer:</b>	Cathie Moore

On March 6, 1998 the Office of Air Management (OAM) had a notice published in the Daily Reporter, Greenfield, Indiana, stating that Avery Dennison had applied for a Part 70 Operating Permit to operate a pressure sensitive tape coating operation. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On April 14, 1998, Jim Fear of Avery Dennison submitted comments on the proposed Part 70 Operating Permit. The summary of comments is as follows (~~strikeout~~ added to show what was deleted and **bold** added to show what was added):

### Comment 1:

A.1 - Change the responsible official from Doug McKenzie to Rob Matt.

### Response to Comment 1:

Condition A.1 "General Information" has been changed to be as follows:

#### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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The Permittee owns and operates a stationary pressure sensitive ~~tape~~ **paper** coating and **laminating** operation.

<b>Responsible Official:</b>	<del>Douglas McKinzie</del> <b>Rob Matt</b>
<b>Source Address:</b>	870 West Anderson Blvd., Greenfield, Indiana 46140
<b>Mailing Address:</b>	870 West Anderson Blvd., Greenfield, Indiana 46140
<b>Phone Number:</b>	<b>317-462-1988</b>
<b>SIC Code:</b>	2672
<b>County Location:</b>	Hancock
<b>County Status:</b>	Attainment for all criteria pollutants
<b>Source Status:</b>	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

### Comment 2:

A.2 (1) - The source requests that the maximum capacity of the coaters (currently managed as confidential) be changed from square meters per hour to 993 Billion Square Inches (BSI). Furthermore, the source requests that item C, be changed to "Five (5) water-based emulsion adhesive and one (1) emulsion wastewater storage tanks, with maximum storage capacities of 16,400 gallons each and 7,000 gallons", respectively. Additionally, Avery Dennison requests that the ASTs be considered as insignificant activities.

D.1 - The source requests that the maximum capacity of the coaters (currently managed as confidential) be changed from square meters per hour to 993 Billion Square Inches (BSI). Furthermore, the source requests that item C, be changed to "Five (5) water-based emulsion adhesive and one (1) emulsion wastewater storage tanks, with maximum storage capacities of 16,400 gallons each, and 7,000 gallons", respectively. Additionally, Avery Dennison requests that the ASTs be considered as insignificant activities.

Technical Support Document - Permitted Emission Units and Pollution Control Equipment - The source requests that the maximum capacity of the coaters (currently managed as confidential) be changed from square meters per hour to 993 Billion Square Inches (BSI). Furthermore, the source requests that item C, be changed to "Five (5) water-based emulsion adhesive and one (1) emulsion wastewater storage tanks, with maximum storage capacities of 16,400 gallons each, and 7,000 gallons", respectively. Additionally, Avery Dennison requests that the ASTs be considered as insignificant activities.

Technical Support Document, Permitted Emission Units and Pollution Control Equipment - Modify the first sentence to read as: "The source consists of the following permitted emission units".

## Response to Comment 2:

1. Condition A.2 "Emission Units and Pollution Control Equipment Summary" has been changed to be as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]  
[326 IAC 2-7-5(15)]

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This stationary source consists of the following emission units and pollution control devices:

- (1) One (1) pressure sensitive ~~tape~~ **paper** coating operation, constructed in October, 1994, identified as BE-1, ~~with maximum capacity is confidential as requested by the source of~~ **nine hundred ninety-three (993) billion square inches per year**, exhausting to two (2) stacks (C-1 and D-1), consisting of the following equipment:

- (A) One (1) flow coating operation; **and**

- (B) Two (2) natural gas fired drying ovens, with total maximum heat input capacity of 48.7 million British thermal units per hour (mmBtu/hr); ~~and.~~

- ~~(C) Six (6) waterbased emulsion adhesive and emulsion wastewater storage tanks, with maximum storage capacities of 16,400 gallons each.~~

- (2) Two (2) natural gas fired boilers, constructed in October, 1994, identified as B-01 and B-02, with maximum heat input capacity of 10.205 million British thermal units per hour (mmBtu/hr) each, exhausting to two (2) stacks (B-01 and B-02).

2. Condition A.3 "Specifically Regulated Insignificant Activities" has been changed to be as follows:

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

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This stationary source ~~does not currently have any~~ **also includes the following** insignificant activities **which are specifically regulated**, as defined in 326 IAC 2-7-1 (21) ~~that have applicable requirements:-~~

- (1) **Five (5) water-based emulsion adhesive storage tanks with maximum storage capacity of 16,400 gallons each; and**

**(2) One (1) emulsion wastewater storage tank with maximum storage capacity of 7,000 gallons.**

3. The equipment listed in Section D.1 "FACILITY OPERATION CONDITIONS" has been changed to be as follows. No conditions in this section have been changed as a result of this equipment description change:

~~(Enhanced New Source Review)~~ **(Advanced Source Modification)**

- (1) One (1) pressure sensitive ~~tape~~ **paper** coating operation, constructed in October, 1994, identified as BE-1, ~~with maximum capacity is confidential as requested by the source of~~ **nine hundred ninety-three (993) billion square inches per year**, exhausting to two (2) stacks (C-1 and D-1), consisting of the following equipment:
- (A) One (1) flow coating operation; **and**
  - (B) Two (2) natural gas fired drying ovens, with total maximum heat input capacity of 48.7 million British thermal units per hour (mmBtu/hr); ~~and.~~
  - ~~(C) Six (6) waterbased emulsion adhesive and emulsion wastewater storage tanks, with maximum storage capacities of 16,400 gallons each.~~

**Insignificant Activities**

- (IA1) Five (5) water-based emulsion adhesive storage tanks with maximum storage capacity of 16,400 gallons each; and**
- (IA2) One (1) emulsion wastewater storage tank with maximum storage capacity of 7,000 gallons.**

4. The Technical Support Document "Permitted Emission Units and Pollution Control Equipment" should be changed to be as follows. However, the Technical Support Document is not physically changed after the Public Notice. Therefore, the changes are noted in this Addendum to the Technical Support Document:

The source consists of the following permitted emission units ~~and pollution control devices~~:

- (1) One (1) pressure sensitive paper coating operation, constructed in October, 1994, identified as BE-1, ~~with maximum capacity is confidential as requested by the source of~~ **nine hundred ninety-three (993) billion square inches per year**, exhausting to two (2) stacks (C-1 and D-1), consisting of the following equipment:
- (A) One (1) flow coating operation; **and**
  - (B) Two (2) natural gas fired drying ovens, with total maximum heat input capacity of 48.7 million British thermal units per hour (mmBtu/hr); ~~and.~~
  - ~~(C) Six (6) waterbased emulsion adhesive and emulsion wastewater storage tanks, with maximum storage capacities of 16,400 gallons each.~~
- (2) Two (2) natural gas fired boilers, constructed in October, 1994, identified as B-01 and B-02, with maximum heat input capacity of 10.205 million British thermal units per hour (mmBtu/hr) each, exhausting to two (2) stacks (B-01 and B-02).

5. The Technical Support Document "Insignificant Activities" should be changed to be as follows. However, the Technical Support Document is not physically changed after the Public Notice. Therefore, the changes are noted in this Addendum to the Technical Support Document:

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) Six (6) natural gas fired unit heaters, with maximum heat input capacity of 0.13 million British thermal units per hour (mmBtu/hr) each;
- (2) Five (5) natural gas fired roof top heating/cooling units, with maximum heat input capacity of 0.163, 0.317, 0.317, 0.278, and 0.400 million British thermal units per hour (mmBtu/hr);
- (3) Twelve (12) natural gas fired door heaters, with maximum heat input capacity of 0.87 million British thermal units per hour (mmBtu/hr) each;
- (4) Seven (7) natural gas fired rotation heating units, with maximum heat input capacity of 0.40 million British thermal units per hour (mmBtu/hr) each;
- (5) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour;
- (6) Combustion source flame safety purging on startup;
- (7) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (8) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings;
- (9) Machining where an aqueous coolant continuously floods the machining interface;
- (10) Cleaners and solvents characterized as follows:
  - A) having a vapor pressure equal to or less than 2 kPa, 15 mmHg, or 0.3 psi measured at 38 degrees C (100 degrees F) or
  - B) having a vapor pressure equal to or less than 0.7 kPa, 5 mmHg, or 0.1 psi measured at 20 degrees C (68 degrees F)the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;
- (11) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment;
- (12) Closed loop heating and cooling systems;
- (13) Infrared cure equipment;
- (14) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs;
- (15) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs;
- (16) Forced and induced draft cooling tower system not regulated under a NESHAP;
- (17) Heat exchanger cleaning and repair;
- (18) Process vessel degassing and cleaning to prepare for internal repairs;
- (19) Paved and unpaved roads and parking lots with public access;

- (20) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process;
- (21) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment;
- (22) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower;
- (23) Stationary fire pumps;
- (24) A laboratory as defined in 326 IAC 2-7-1(20)(C); ~~and~~
- (25) Silicone Batching;
- (26) Five (5) water-based emulsion adhesive storage tanks with maximum storage capacity of 16,400 gallons each; and**
- (27) One (1) emulsion wastewater storage tank with maximum storage capacity of 7,000 gallons.**

**Comment 3:**

B.10 (a) - The source requests that the State consider amending the language to include a statement that certification is not required for State-Only Requirements.

**Response to Comment 3:**

Pursuant to 326 IAC 2-7-6(1) (Compliance Requirements), the source shall submit a compliance certification for **all** federal and state requirements listed in the Part 70 Permit. There will be no changes to this condition in the final permit due to this comment.

**Comment 4:**

B.11 (a) - The source would like the State to consider compliance certification once every five (5) years versus annual.

B.11 (c) - The source requests that the State incorporate language whereby certification of compliance does not address compliance with Section 112(g) of the Clean Air Act, with 326 IAC 2-1-1(b)(1)(H), or with 326 IAC 2-1-3.3.

**Response to Comment 4:**

Pursuant to 326 IAC 2-7-6(5)(A) (Compliance Requirements), the source shall submit a compliance certification not less than annually or such more frequent periods as specified in the applicable requirements or by the Commissioner. Pursuant to 326 IAC 2-7-6(1) (Compliance Requirements), the source shall submit a compliance certification for **all** federal and state requirements listed in the Part 70 Permit. There will be no changes to this condition in the final permit due to this comment.

**Comment 5:**

B.14 (a) - The source desires that the State consider incorporating the statements made by Avery Dennison in a cover letter submitted with the Part 70 Operating Permit application (Attachment II). Specifically, the request for permit shield included; 1) acetone not being regulated as a VOC, 2) insignificant solvent degreasing operations, 3) case-by-case MACT, 4) Opacity (326 IAC 5-1), 5) fugitive dust limitations, and 6) PSD requirements.

**Response to Comment 5:**

Since the source is subject to the requirements of MACT, Opacity (326 IAC 5-1) and fugitive dust limitations, it must comply with the permit conditions listed in the Part 70 Permit. There will be no changes to Conditions B.14 "Permit Shield", C.2 "Opacity" and C.5 "Fugitive Dust Emissions" in the final permit due to this comment.

The OAM will not regulate acetone because it has been determined to be a nonphotochemically reactive hydrocarbon. Thus, acetone has been included in the state rule definition under 326 IAC 1-2-48 (Nonphotochemically Reactive Hydrocarbon) as not being a VOC.

Since the insignificant degreasing operations no longer exist at the source, it is not necessary to regulate nonexistent units in the Title V permit.

**Comment 6:**

C.2 - Eliminate this term and condition. The source is in compliance with 326 IAC 5-1. Therefore, the source is not subject to recordkeeping and daily particulate emissions notations.

**Response to Comment 6:**

This condition is applicable to any facility that has the potential to emit particulate matter (PM) and the rule does not specify any significant level. For this source the natural gas-fired boilers and some insignificant activities have potential particulate matter (PM) emissions. Therefore, these facilities would be subject to the requirements of 326 IAC 5-1-2 (Opacity). However, there are no opacity related record keeping or daily particulate emission notations required by this permit other than an appropriate statement in the Annual Compliance Certification. There will be no changes to this condition in the final permit due to this comment.

**Comment 7:**

C.4 - Eliminate this term and condition. The State should consider elimination of 326 IAC 4-2 and 9-1-2 since incineration as a control device is not a current operation with the source.

**Response to Comment 7:**

This condition states, "The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2." This condition is a general prohibition against improper incineration that applies to all sources, whether the source has incinerators or not. Waster material can only be burned in equipment that meets the cited requirements. There will be no changes to this condition in the final permit due to this comment.

**Comment 8:**

C.6 - Eliminate this term and condition. The State should consider elimination of 326 IAC 2-7-6(6) since control equipment is not present within the source.

**Response to Comment 8:**

Condition C.6 "Operation of Equipment" will not be removed, even though this source does not have any control equipment at this time. However, the condition is required to stay in the permit because a new facility could be added to the source at some later date. If the new facility has control equipment, the source will be aware of their responsibilities for the control equipment. Also, this decreases the number of changes to the permit upon modification and lessens the likelihood of confusion.

**Comment 9:**

C.7 - Eliminate this term and condition. The State should consider elimination of 326 IAC 14-10, 18 and 40 CFR 61 subpart M since asbestos is not present within the source.

**Response to Comment 9:**

The Office of Air Management (OAM) includes all applicable requirements contained in Title 326 of the Indiana Air Code (IAC) in the Part 70 Operating Permits. Condition C.7 "Asbestos Abatement Projects" is applicable to every source located in Indiana, regardless of operation or potential emissions.

Pursuant to 326 IAC 14-10-2(14) (Definitions), "Demolition" means the wrecking or taking out of any load-supporting structural member of a facility together with any related handling operations or the intentional burning of any facility.

Pursuant to 326 IAC 14-10-1(a)(1) (Applicability), notification is required even if no asbestos is present.

There will be no changes to this condition in the final permit due to this comment.

**Comment 10:**

C.8 - Eliminate this term and condition. The State should consider elimination of 326 IAC 3-2.1 since performance testing of air pollution control equipment is not present within the source.

**Response to Comment 10:**

Condition C.8 "Performance Testing" will not be removed. Since this source does not have any testing requirements, this condition would not be applicable to the source at this time. However, the condition is required to stay in the permit because a new facility could be added to the source at some later date. If the new facility has testing requirements, the source will be aware of their responsibilities under the testing requirements. Also, this decreases the number of changes to the permit upon modification and lessens the likelihood of confusion.

**Comment 11:**

C.14 - Eliminate this term and condition. The State should consider elimination of 326 IAC 2-7-5(12) and 40 CFR 68.215 given Risk Management Plans are not required for this source based on chemical inventories.

**Response to Comment 11:**

The Risk Management Plan provision does not state that the Permittee has more than the threshold quantity of a regulated substance. The provision may be applicable if the Permittee does meet the threshold at some time in the future. There will be no change to this condition in the final permit due to this comment.

**Comment 12:**

C.15 - Eliminate this term and condition as it pertains to stack test conformance of air pollution control equipment.

**Response to Comment 12:**

Condition C.15 (now renumbered Condition C.14) "Actions Related to Noncompliance Demonstrated by a Stack Test" will not be removed. Since this permit does not have any testing requirements, this condition would not be applicable to the source at this time. However, the condition is required to stay in the permit because a new facility could be added to the source at some later date. If the new facility has testing requirements, the source will be aware of their responsibilities under the testing requirements. Also, this decreases the number of changes to the permit upon modification and lessens the likelihood of confusion.

**Comment 13:**

C.19 (a) - The source requests that the State considers changing the compliance report monitoring under 2-7-5 from quarterly to a six (6) month basis. This would appear consistent with the provisions under 326 IAC 2-7-5(3)(C).

**Response to Comment 13:**

Quarterly Compliance Reporting is required to document compliance with the permit requirements listed in this permit. 326 IAC 2-7-5(3)(C)(i) gives IDEM the authority to require reports "at least" every six months. The Office of Air Management feels that reporting semiannually rather than quarterly would increase the possibility for a malfunction of the facilities and could lead to a deviation from the permit requirements. There will be no changes to this condition in the final permit due to this comment.

**Comment 14:**

D.1.8 - Eliminate this term and condition. The preventative maintenance plan pertains to control devices which do not exist within the source.

**Response to Comment 14:**

Upon further review, OAM feels that a Preventive Maintenance Plan is not necessary for these facilities. Therefore, this condition has been deleted from the final permit as follows. The remaining conditions of this section have been renumbered:

~~D.1.8 - Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

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~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.~~



**Comment 15:**

D.1.9 - The facility desires that the State replace EPA method 8260A with 8260M. This method of quantifying VOCs in water-based coatings was recently approved by USEPA Research Triangle Park.

**Response to Comment 15:**

Condition D.1.9 (now renumbered Condition D.1.3) "Testing Requirements" has been changed to be as follows because the source is taking a limit on their potential to emit (PTE) volatile organic compound (VOC) so that 40 CFR 60.440, Subpart RR is not applicable. Therefore, the testing requirements to show compliance with this subpart are no longer necessary:

**D.1.93 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]**

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~~The Permittee shall perform VOC testing utilizing EPA Method 8260A, or other methods as approved by the Commissioner as necessary to determine compliance with 40 CFR 60.440, Subpart RR.~~ **Whenever, the input VOC usage exceeds forty-five (45) megagrams per 12 consecutive month period, the Permittee shall perform VOC testing using the method established in the test protocol. IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required, compliance with the Volatile Organic Compound (VOC) limits specified in Conditions D.1.1 and D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.**

**Comment 16:**

D.1.10 - The facility desires that the State replace EPA method 24 with 8260M.

**Response to Comment 16:**

EPA Method 24 is the standard method requested for use to determine VOC content by the Office of Air Management (OAM). The term "analytical procedures" in the last sentence is intended to mean any calculations (i.e. ASTM) may also be used to determine VOC content. There will be no changes to this condition in the final permit due to this comment.

**Comment 17:**

D.1.12 - The source requests that the State restrict recordkeeping requirements to only those needed to demonstrate compliance with 326 IAC 8-2-5. The pressure sensitive tape coating operation does not apply VOCs greater than 45 Megagram annually (Subpart RR), and therefore, is not subject to the monthly use and discharge limitations currently stated within the draft permit. The source would suggest that recordkeeping be limited to maintaining records of the percent VOC content in each wet coating. This information would be used in demonstrating compliance with 2.9 pounds VOC per gallon coating delivered to the applicator less water.

**Response to Comment 17:**

1. The source is required to keep the records listed in Condition D.1.12(a) (now renumbered Condition D.1.6(a)) "Record Keeping Requirements" to show compliance with the 2.9 pounds per gallon limit stated in Condition D.1.6 (now renumbered Condition D.1.1) "Volatile Organic Compound", the 45 megagrams per year limit stated in Condition D.1.7 (now renumbered Condition D.1.2) "Volatile Organic Compound" as follows, and to show that the volatile organic compound (VOC) emissions are less than two hundred fifty (250) tons per year.

The calculation of daily volume weighted average of the coatings used, is a method of compliance with 326 IAC 8-2-5 that should be used to show compliance on any day that any coating with VOC content of greater than 2.9 pounds per gallon is used. Condition D.1.12(a) (now renumbered Condition D.1.6(a)) "Record Keeping Requirements" has been changed to be as follows:

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through ~~(6)~~**(5)** below. Records maintained for (1), ~~through (2), (4), and (5)~~**(6)** shall be taken monthly. **Records maintained for (3) shall be taken daily as needed. and All records maintained** shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1 and D.1.2.
- (1) The amount and VOC content of each coating material and solvent used. Records ~~shall~~ **may** include purchase orders, invoices, **production data and or** material safety data sheets (MSDS) **as** necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- (2) A log of **usage each month and logs of** the dates of use **when using non-compliant coatings**;
- (3) The volume weighted VOC content of the coatings used for each month ~~day~~ **that any coating with VOC content greater than 2.9 pounds per gallon is used. If at any time a coating with VOC content greater than 2.9 pounds per gallon less water is used, compliance with this rule shall be shown by use of the following equation to calculate daily volume weighted average:**
- $$\frac{\text{lb VOC}}{\text{gallon less water}} = \frac{3 \text{ coatings } [D_c * O * Q / [1 - W * D_c / D_w]]}{3C}$$
- D<sub>c</sub> = density of coating, lb/gal                      D<sub>w</sub> = density of water, lb/gal**  
**O = weight percent organics, %                      Q = quantity of coating, gal/unit**  
**W = percent volume water, %                      C = total of coatings used, gal/unit;**
- ~~(4)~~ — The cleanup solvent usage for each month;
- ~~(5)~~**(4)** The total VOC usage for each month; and
- ~~(6)~~**(5)** The weight of VOCs emitted for each compliance period.

2. Condition D.1.7 (now renumbered Condition D.1.2) "Volatile Organic Compound" has been changed to be as follows:

**D.1.72 Volatile Organic Compounds (VOC) [326 IAC 12] [40 CFR 60.440, Subpart RR]**

Pursuant to 40 CFR ~~60.440~~ **60.442**, Subpart RR, ~~when the paper/pressure sensitive tape paper and label coating operation input~~ **Volatile Organic Compound (VOC) usage exceeds 45 megagrams per 12 consecutive month period (equivalent to 49.6 tons per 12 consecutive month period), the pressure sensitive paper coating operation** shall not discharge into the atmosphere in excess of 0.20 kg VOC per kg of coating solids (**0.20 lb VOC per lb of coating solids**) applied as calculated on a weighted average basis for ~~one~~ **each** calendar month.

3. Condition D.1.12(c) (now renumbered Condition D.1.6(c)) "Record Keeping Requirements" has been added to the final permit as follows. The remaining subsections of this condition have been re-lettered:

**(c) Pursuant to 40 CFR 60.445, the Permittee shall maintain the following records:**

- (1) A calendar month record of all coatings used and the results of the manufacturer's formulation data.**
- (2) A calendar month record of the amount of solvent applied in the coating facility.**

4. Condition D.1.13 (now renumbered Condition D.1.7) "Reporting Requirements" has been added to the permit as follows:

**D.1.13 Reporting Requirements**

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A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

5. A quarterly report was also added to the permit for Condition D.1.7.

**Comment 18:**

D.2.1 - The source requests that the State change the particulate (PM) emission limitation from 0.49 pounds per MMBtu (source B-01 and B-02) to equate to the current construction permit PM limitation of 0.6 pounds PM per MMBtu for each facility.

**Response to Comment 18:**

The limitation stated in the current construction permit was calculated with the maximum heat input capacity of 10.46 million British thermal units per hour for each boiler. The current Part 70 permit application information states that the maximum heat input capacity of each boiler at 10.205 million British thermal units per hour. The particulate matter limitation was based on the capacities stated in the Part 70 permit application. OAM has performed the calculations again and determined that 0.49 pounds particulate matter (PM) per million British thermal unit is in fact the correct limitation for the two (2) boilers. There will be no changes to this condition in the final permit due to this comment.

**Comment 19:**

D.2.4 - The source would like the State to amend this condition so that it is specific to certification of the types of alternate fuels used within the existing steam generator boilers.

**Response to Comment 19:**

The source shall indicate when **any** fuel other than natural gas is used in the boilers. There will be no changes to this condition in the final permit due to this comment.

**Comment 20:**

Technical Support Document, Federal Rule Applicability (b) - Change the statement to reflect the following: "Five (5) water-based emulsion adhesive storage tanks with a maximum storage capacities of 16,400 gallons each are subject to the New Source Performance Standard....to 40 CFR 60.116b (a) and (b)".

**Response to Comment 20:**

The Technical Support Document, Federal Rule Applicability (b) should be changed to be as follows. However, the Technical Support Document is not physically changed after the Public Notice. Therefore, the changes are noted in this Addendum to the Technical Support Document:

- (b) **The one (1) emulsion wastewater storage tank is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110b, Subpart Kb) because its storage capacity is less than forty (40) cubic meters.** The ~~six (6)~~ **five (5)** waterbased emulsion adhesive ~~and emulsion wastewater~~ storage tanks are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.116b, Subpart Kb) because their storage capacities are greater than forty (40) cubic meters, but less than seventy-five (75) cubic meters. Pursuant to 40 CFR 60.116b (a) and (b):
  - (1) The Permittee shall keep records readily accessible of the dimension of each storage vessel and an analysis showing the capacity of each storage vessel for the life of the source.

Condition D.1.12(b) (now renumbered Condition D.1.6(b)) "Record Keeping Requirements" has been changed to be as follows:

- (b) The Permittee shall keep records readily accessible of the dimension of ~~each~~ **the five (5) waterbased emulsion adhesive** storage vessels and an analysis showing the capacity of each storage vessel for the life of the source.

**Comment 21:**

Technical Support Document, State Rule Applicability - 326 IAC 1-6-3 - Eliminate reference to the rule since the source does not have control equipment subject to the PMP provisions.

**Response to Comment 21:**

IDEM, OAM agrees that this change should be made. The Technical Support Document (TSD) should also reflect these changes. However, the TSD is not physically changed after public notice. The changes are noted here in the Addendum to the Technical Support Document.

**Comment 22:**

Technical Support Document, Compliance Requirements - 326 IAC 1-6-3 - Eliminate reference to the rule since the source does not have control equipment subject to the PMP provisions.

**Response to Comment 22:**

IDEM, OAM agrees that this change should be made. The Technical Support Document (TSD) should also reflect these changes. However, the TSD is not physically changed after public notice. The changes are noted here in the Addendum to the Technical Support Document.

Upon further review, OAM has made the following changes to the final Part 70 permit (~~strikeout~~ added to show what was deleted and **bold** added to show what was added):

1. The second paragraph on the cover page has been changed to be as follows:

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and ~~326 IAC 2-4-3.2~~ as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

2. The name in the signature block on the cover page has been changed from "Felicia R. George" to "**Janet G. McCabe**".
3. A "Source Summary" has been changed to be as follows:

## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and presented in the permit application. **The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.**

4. Condition A.4 "Part 70 Permit Applicability" has been changed to be as follows:

### A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22).
- (b) **It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).**

5. Condition A.5 "Prior Permit Conditions Superseded" has been deleted as follows:

### ~~A.5 Prior Permit Conditions Superseded [326 IAC 2]~~

~~The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source, and supersede all terms and conditions in all registrations and permits, including construction permits, issued prior to the date of issuance of this permit. All terms and conditions in such registrations and permits are no longer in effect.~~

6. Condition B.1 "Permit No Defense" has been changed to be as follows:

### B.1 Permit No Defense [326 IAC 2-4-10] [IC 13]

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.

- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with ~~326 IAC 2-1-3.2 or 326 IAC 2-7-15~~, **as set out in this permit in the Section B condition entitled "Permit Shield."**
7. Condition B.8(c) "Duty to Supplement and Provide Information" has been changed to be as follows:
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM copies of records required to be kept by this permit. **If the Permittee wishes to assert a claim of confidentiality over any of the furnished records,** ~~For information claimed to be confidential,~~ the Permittee ~~must~~ **shall** furnish such records to IDEM, OAM along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, **to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records,** then the Permittee ~~must~~ **shall** furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.
8. Condition B.10(a) "Annual Compliance Certification" has been changed to be as follows:
- (a) **Where specifically designated by this permit or required by an applicable requirement, any** ~~Any~~ application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
9. Condition B.11(c) "Annual Compliance Certification" has been changed to be as follows:
- (c) The annual compliance certification report shall include the following:
- (1) The identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was **based on** continuous or intermittent **data**;
  - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); ~~and~~
  - (5) Any insignificant activity that has been added without a permit revision; and**
  - ~~(5)~~ **(6)** Such other facts, as specified in Sections D of this permit, as IDEM, OAM may require to determine the compliance status of the source.

The ~~notification which shall be submitted~~ **submittal** by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

10. Condition B.12 "Preventive Maintenance Plan" has been changed to be as follows:

**B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each **facility**:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing ~~emission units and associated~~ emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

**If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:**

**Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015**

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

11. Condition B.13(e) "Emergency Provisions" has been changed to be as follows:

- (e) IDEM, OAM may require that the Preventive Maintenance Plans required under 326 IAC ~~2-7-4(e)(9)~~ **2-7-1(c)(10)** be revised in response to an emergency.

12. Condition B.14 "Permit Shield" has been changed to be as follows:

**B.14 Permit Shield [326 IAC 2-7-15]**

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- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.**
- ~~(a)~~ **(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.** Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided ~~that either of the following~~:
- (1) The applicable requirements are included and specifically identified in this permit;  
**or**

- (2) ~~IDEM, OAM in acting on the Part 70 permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 permit includes the determination or a concise summary thereof.~~ **The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.**
- ~~(b) (c)~~ **(c)** No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. **If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.**
- ~~(c) (d)~~ **(d)** ~~If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.~~ **No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.**
- ~~(d) (e)~~ **(e)** Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- ~~(e) (f)~~ **(f)** This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- ~~(f) (g)~~ **(g)** This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- ~~(g) (h)~~ **(h)** This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM has issued the modification. ~~[326 IAC 2-7-12(b)(8)]~~ **[326 IAC 2-7-12(b)(7)]**



13. Condition B.16 "Deviations from Permit Requirements and Conditions" has been changed to be as follows:

**B.16** Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) **A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:**

- (1) **An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or**
- (2) **An emergency as defined in 326 IAC 2-7-1(12); or**
- (3) **Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.**
- (4) **Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.**

**A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.**

- ~~(b)~~ (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. **The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).**
- ~~(c)~~ (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

14. Condition B.18(a) "Permit Renewal" has been changed to be as follows:

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) **and 326 IAC 2-7-1(40).**

15. Condition B.18(b)(1)(B) "Permit Renewal" has been changed to be as follows:

- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due. ~~[326 IAC 2-5-3]~~

16. Condition B.19 "Administrative Permit Amendment", Condition B.20 "Minor Permit Modification", and Condition B.21 "Significant Permit Modification" have all been combined into one condition numbered Condition B.19 "Permit Amendment or Modification" as follows. The remaining conditions of this section have been renumbered:

~~B.19 — Administrative Permit Amendment [326 IAC 2-7-11]~~

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- ~~(a) — An administrative permit amendment is a Part 70 permit revision that makes changes of the type specified under 326 IAC 2-7-11(a).~~
- ~~(b) — An administrative permit amendment may be made by IDEM, OAM consistent with the procedures specified under 326 IAC 2-7-11(c).~~
- ~~(c) — The Permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]~~

~~B.20 — Minor Permit Modification [326 IAC 2-7-12]~~

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- ~~(a) — A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendment under 326 IAC 2-7-11.~~
- ~~(b) — Minor modification to this permit shall follow the procedures specified under 326 IAC 2-7-12(b), except as provided by 326 IAC 2-7-12(c).~~
- ~~(c) — An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-7-12(b) and shall include the information required in 326 IAC 2-7-12(b)(3)(A) through (E).~~
- ~~(d) — The Permittee may make the change proposed in its minor permit modification application immediately after it files such application provided that the change has received any approval required by 326 IAC 2-1. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM takes any of the actions specified in 326 IAC 2-7-12(b)(6)(A) through (C), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-7-12(b)(7)]~~

~~B.21 — Significant Permit Modification [326 IAC 2-7-12(d)]~~

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- ~~(a) — Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative amendments.~~
- ~~(b) — Every significant change in existing monitoring permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions of this permit shall be considered significant.~~
- ~~(c) — Nothing in 326 IAC 2-7-12(d) shall be construed to preclude the Permittee from making changes consistent with 326 IAC 2-7 that would render existing permit compliance terms and conditions irrelevant.~~
- ~~(d) — Significant modifications of this permit shall meet all requirements of 326 IAC 2-7, including those for application, public participation, review by affected states, review by the U.S. EPA, and availability of the permit shield, as they apply to permit issuance and renewal.~~

**B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

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(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

**Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015**

Any such application should be certified by the “responsible official” as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

17. Condition B.26 (now renumbered Condition B.24) “Inspection and Entry” has been changed to be as follows:

**B.2624 Inspection and Entry [326 IAC 2-7-6(2)]**

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Upon presentation of ~~IDEM~~ **proper** identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.  
[326 IAC 2-7-6(6)]

(1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source.

**In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]**

- (2) The Permittee, and IDEM, OAM acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]**

18. Condition B.27 (now renumbered Condition B.25) "Transfer of Ownership or Operation" has deleted from the final permit and replaced with the following condition:

~~B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]~~

~~Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:~~

- ~~(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.~~
- ~~(b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11.~~
- ~~(c) IDEM, OAM shall reserve the right to issue a new permit.~~

**B.25 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.**
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:**

**Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015**

**The application which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]**

19. Condition B.28 (now renumbered Condition B.26) "Annual Fee Payment" has been changed to be as follows:

**B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]**

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- (a) The Permittee shall pay annual fees to IDEM, OAM within thirty (30) calendar days of receipt of a billing. ~~or in a time period consistent with the fee schedule established in 326 IAC 2-7-19. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.~~
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) ~~If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date,~~ The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. ~~The applicable fee is due April 1 of each year.~~

20. Condition B.27 "Enhanced New Source Review" has been deleted from the final permit and replaced with the following condition:

~~**B.27 Enhanced New Source Review [326 IAC 2]**~~

---

~~The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.~~

**B.27 Advanced Source Modification Approval [326 IAC 2-7-5(16)]**

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**The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3 and such modifications occur only during the term of this permit.**

21. Condition C.1 "PSD Minor Source Status" has been deleted from the final permit as follows. The remaining conditions of this section have been renumbered:

~~**C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]**~~

---

- ~~(a) The total source potential emissions of volatile organic compound (VOC) are less than 250 tons per 365 consecutive day period. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.~~
- ~~(b) Any change or modification which may increase potential emissions to 250 tons per twelve (12) consecutive month period, from the equipment covered in this permit, shall require a PSD permit pursuant to 326 IAC 2-2, before such change may occur.~~

22. Condition C.1 "Particulate Matter Emission Limitations for Processes with Process Weight Rates Less Than One Hundred pounds per hour" has been added to the permit as follows. The remaining conditions of this section have been renumbered:

**C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]**

---

**Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.**

23. Condition C.2 "Opacity" has been changed to be as follows:

**C.2 Opacity [326 IAC 5-1]**

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Pursuant to 326 IAC 5-1-2 (~~Visible Emissions~~ **Opacity** Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), ~~visible emissions opacity~~ shall meet the following, unless otherwise stated in this permit:

- (a) ~~Visible emissions~~ **Opacity** shall not exceed an average of forty percent (40%) ~~opacity~~ in ~~twenty-four (24) consecutive readings~~ **any one (1) six minute averaging period**, as determined in 326 IAC 5-1-4.
- (b) ~~Visible emissions~~ **Opacity** shall not exceed sixty percent (60%) ~~opacity~~ for more than a cumulative total of fifteen (15) minutes (sixty (60) readings **as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor**) in a six (6) hour period.

24. Condition C.6 "Operation of Equipment" has been changed to be as follows:

**C.6 Operation of Equipment [326 IAC 2-7-6(6)]**

---

All air pollution control equipment listed in this permit **and used to comply with an applicable requirement** shall be operated at all times that the emission unit(s) vented to the control equipment are in operation. ~~as described in Section D of this permit.~~

25. Condition C.7 "Asbestos Abatement Projects- Accreditation" and Condition C.13 "Asbestos Abatement Projects" have been combined into one condition as follows:

~~C.7 Asbestos Abatement Projects- Accreditation [326 IAC 14-10] [326 IAC 18]  
[40 CFR 61, Subpart M]~~

---

~~Prior to the commencement of any demolition or renovation activities, the Permittee shall use an Indiana accredited asbestos inspector to inspect thoroughly the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material. The requirement that the inspector be accredited is federally enforceable.~~

**C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]**

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- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:

- (A) Asbestos removal or demolition start date;
  - (B) Removal or demolition contractor; or
  - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

26. Condition C.8 "Performance Testing" has been changed to be as follows:

**C.8 Performance Testing** ~~[326 IAC 3-2-1]~~ **[326 IAC 3-6]**

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- (a) All testing shall be performed according to the provisions of 326 IAC ~~3-2-1~~ **3-6** (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days ~~before~~ **prior to** the intended test date. **The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.**

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

**The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

27. Condition C.9 "Compliance Schedule" has been changed to be as follows:

C.9 Compliance Schedule [326 IAC 2-7-6(3)]

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The Permittee:

- (a) **Has certified that all facilities at this source are in compliance with all applicable requirements; and** ~~Will continue to comply with such requirements that become effective during the term of this permit; and~~
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) **Will comply with such applicable requirements that become effective during the term of this permit.** ~~Has certified that all facilities at this source are in compliance with all applicable requirements.~~

28. Condition C.10 "Compliance Monitoring" has been changed to be as follows:

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee **may extend the compliance schedule an additional ninety (90) days provided the Permittee** ~~shall~~ notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, **prior to the end of the initial ninety (90) day compliance schedule** ~~no more than ninety (90) days after receipt of this permit, with full justification of the reasons for the inability to meet this date. and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.~~

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

29. Condition C.11 "Monitoring Methods" has been changed to be as follows:

C.11 Monitoring Methods [326 IAC 3]

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Any monitoring or testing performed to meet the **applicable** requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.



30. Condition C.14 (now renumbered Condition C.13) "Risk Management Plan" has been changed to be as follows:

**C.413 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]**

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If a regulated substance, subject to 40 CFR 68, is present **at a source** in more than ~~the~~ **a** threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
  - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
  - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
  - (3) A verification to IDEM, OAM that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM that the Risk Management Plan is being properly implemented.

**All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

31. Condition C.15 (now renumbered Condition C.14) "Actions Related to Noncompliance Demonstrated by a Stack Test" has been changed to be as follows:

**C.4514 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]**

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

**The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

32. Condition C.16(a) (now renumbered Condition C.15(a)) "Emission Statement" has been changed to be as follows:

- (a) The Permittee shall submit an ~~certified~~, annual emission statement **certified pursuant to the requirements of 326 IAC 2-6**, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

33. The rule cite and (a) of Condition C.18 (now renumbered Condition C.17) "General Record Keeping Requirements" has been changed to be as follows:

~~C.4817~~ General Record Keeping Requirements [326 IAC 2-7-5(3)(B)] **[326 IAC 2-7-6]**

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- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location **for a minimum of three (3) years** and available **upon the request** ~~within one (1) hour upon verbal request~~ of an IDEM, OAM representative, for a minimum of three (3) years. ~~They~~ **The records** may be stored elsewhere for the remaining two (2) years **as long as they are available upon request** ~~providing they are made available within thirty (30) days after written request~~. **If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.**

34. Condition C.19 (now renumbered Condition C.18) "General Reporting Requirements" has been changed to be as follows:

~~C.4918~~ General Reporting Requirements [326 IAC 2-7-5(3)(C)]

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- (a) To affirm that the source has met all the **compliance monitoring** requirements stated in this permit the source shall submit a Quarterly Compliance **Monitoring** Report. Any deviation from the requirements and the date(s) of each deviation must be reported. **The Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. **The reports do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**
- (e) All instances of deviations **as described in Section B- Deviations from Permit Requirements Conditions** must be clearly identified in such reports. **The Emergency/Deviation Occurrence Report does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

~~\_\_\_\_\_ A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:~~

~~\_\_\_\_\_ (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~

~~\_\_\_\_\_ (2) An emergency as defined in 326 IAC 2-7-1(12); or~~

~~\_\_\_\_\_ (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.~~

~~\_\_\_\_\_ (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~

~~\_\_\_\_\_ A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.~~

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

35. The following rule cite was added to the equipment listing in Sections D.1 and D.2 "FACILITY OPERATION CONDITIONS"

#### **Facility Description [326 IAC 2-7-5(15)]**

36. The following conditions in Section D.1 have been deleted from the final permit as follows. The remaining conditions of this section have been renumbered:

~~THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW:~~

#### **~~Construction Conditions [326 IAC 2-1-3.2]~~**

##### **~~General Construction Conditions~~**

~~D.1.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.~~

##### **~~Effective Date of the Permit~~**

~~D.1.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.~~

~~D.1.3 Pursuant to 326 IAC 2-1-9(b) (Revocation of Permits), IDEM, OAM, may revoke this section of the approved permit if construction is not commenced within eighteen (18) months after receipt of this permit or if construction is suspended for a continuous period of one (1) year or more.~~

~~D.1.4 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).~~

### **First Time Operation Permit**

~~D.1.5 This document shall also become the first-time operation permit for the facilities under this section of this permit, pursuant to 326 IAC 2-1-4 (Operating Permits) when, prior to start of operation, the following requirements are met:~~

~~\_\_\_\_\_ (a) The attached affidavit of construction shall be submitted to:~~

~~\_\_\_\_\_ Indiana Department of Environmental Management  
\_\_\_\_\_ Permit Administration & Development Section, Office of Air Management  
\_\_\_\_\_ 100 North Senate Avenue, P.O. Box 6015  
\_\_\_\_\_ Indianapolis, Indiana 46206-6015~~

~~\_\_\_\_\_ verifying that the facilities were constructed as proposed in the application. The facilities covered in this section of this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.~~

~~\_\_\_\_\_ (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.~~

~~\_\_\_\_\_ (c) The permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this permit.~~

### **Operation Conditions**

37. Condition D.1.6 (now renumbered Condition D.1.1) "Volatile Organic Compounds" has been changed to be as follows:

#### D.1.61 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]

Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the VOC content of the coatings applied to labels of any substrate, pressure sensitive tapes, paper, plastic or metal foil by means of web coating shall be limited to **no owner or operator of a facility engaged in the surface coating of pressure sensitive paper may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 2.9 pounds VOC per gallon of coating delivered to the applicator less excluding water, delivered to the coating applicator.**

38. Condition D.1.9 (now renumbered Condition D.1.3) "Testing Requirements" has been changed to be as follows:

#### D.1.93 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee shall perform VOC testing utilizing EPA Method 8260A, or other methods as approved by the Commissioner as necessary to determine compliance with 40 CFR 60.440, Subpart RR. **Whenever, the input VOC usage exceeds forty-five (45) megagrams per 12 consecutive month period, the Permittee shall perform VOC testing using the method established in the test protocol. IDEM may require compliance testing when necessary to determine if the facility is in compliance.**

**If testing is required, compliance with the Volatile Organic Compound (VOC) limits specified in Conditions D.1.1 and D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.**

39. Condition D.1.10 (now renumbered Condition D.1.4) "Volatile Organic Compounds" has been changed to be as follows:

**D.1.4 Volatile Organic Compounds (VOC)**

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Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

40. Condition D.2.2 "Testing Requirements" has been changed to be as follows:

**D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]**

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~~Testing of The Permittee is not required to test this facility is not specifically required by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required, compliance with the particulate matter (PM) limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

41. Condition D.2.4 "Record Keeping Requirements" has been added to the final permit as follows. The remaining conditions of this section have been renumbered:

**D.2.4 Record Keeping Requirements**

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**Pursuant to 40 CFR 60.40c, the Permittee shall record and maintain records of the amounts of fuel combusted during each day for a period of two years following the date of such record for the two (2) 10.205 million British thermal units per hour (mmBtu/hr) natural gas fired boilers, identified as B-01 and B-02.**

42. On the Certification Form, the line "Emergency/Deviation Occurrence Reporting Form" has been deleted.
43. On the Emergency/ Deviation Occurrence Reporting Form, the last sentence "Attach a signed certification to complete this report" has been deleted from the bottom of the second page.
44. The Quarterly Compliance Report is now called the Quarterly Compliance Monitoring Report, deleted the column marked "No Deviations", and the language on the form has been changed.